



10 Paterson Street  
New Brunswick, NJ 08901  
Tel: (732) 545-4717 Fax: (732) 545-4579  
www.hoaglandlongo.com

Thaddeus J. Hubert, III  
Partner  
Certified by the Supreme Court of New Jersey as a Civil  
Trial Attorney  
thubert@hoaglandlongo.com

October 31, 2017

**VIA E-FILING**

The Honorable Michael A. Hammer, U.S.M.J.  
US District Court of NJ - Newark  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: Wolf, Karin vs. State of New Jersey, Northeast New Jersey Legal Services, et als**  
Our File No.: 6263738 - TJH  
Claim No.: LWA 27347  
Docket No.: 2:17-cv-02072-MCA-MAH

Dear Judge Hammer:

This office represents defendant, Northeast New Jersey Legal Services ("NNJLS"), in the above referenced matter. We have received the October 26, 2017 letter from Steven J. Tegrar, Esq., counsel for defendant, Peter Van Aulen, Esq., requesting a stay of this matter until the Court decides Mr. Van Aulen's pending motion to dismiss. We have also received Your Honor's October 30, 2017 Order staying discovery in this matter.

This office has also filed a motion to dismiss the plaintiffs' complaint for failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6). This motion is currently returnable on November 20, 2017 before the Honorable Madeline Cox Arelo. I would request that Your Honor's Order staying discovery in this matter be extended until the Court decides the pending motion of NNJLS since NNJLS would suffer the same hardship that the Order protects Mr. Van Aulen from experiencing; plaintiffs would suffer no prejudice from the short extension of the stay; and, the stay has the potential to simplify issues for trial.

I appreciate Your Honor's consideration of this request.

Respectfully submitted,

THADDEUS J. HUBERT, III

TJHIII:aff

cc: Ms. Karin Wolf (e-mail and Cert. Mail)  
Ashley L. Costello, DAG @ Christopher S. Porrino, Attorney General of New Jersey  
Mitchell Schonfeld, CEO/President @ Bergen Family Center (e-mail and Lawyer Service)  
Paul J. Soderman, Esq.  
Steven J. Tegrar, Esq. @ Law Office of Steven J. Tegrar